

## REMARKS

Claims 1-41 are pending in the present application. Claims 1-41 stand rejected. Claims 20, 24, 31, and 38 have been amended.

**35 U.S.C. § 112 Rejections**

Claims 20, 31 and 38 stand rejected under 35 U.S.C. § 112, second paragraph. Claims 20, 24, 31, and 38 have been amended to correct antecedent basis deficiencies, and not to narrow the claims.

**35 U.S.C. § 102 Rejections**

Claims 1-3, 5-6, 8-21 and 23 stand rejected under 35 U.S.C. 102(a) as being anticipated by Tomko (U.S. Pat. No. 5,878,240).

Claim 1 recites a method including receiving configuration data that indicates which one of a plurality of memory controllers will support each of a plurality of clients, receiving data access requests from each of the plurality of clients; and routing each of the data access requests to one of the plurality of memory controllers based on the configuration data.

Tomko does not disclose receiving configuration data. Instead, Tomko only discloses receiving a data access request. Furthermore, the data access request of Tomko is not routed based on any configuration data as recited in claim 1. For at least this reason, the rejection of claim 1 under § 102 based on Tomko is respectfully requested to be withdrawn.

Claim 1 further stands rejected under 35 U.S.C. 102(e) as being anticipated by Murakami et al. (U.S. Pat. No. 6,330,036) ("Murakami").

Murakami does not disclose receiving configuration data that indicates which one of a plurality of memory controllers will support each of a plurality of clients as recited in claim 1. No plurality of memory controllers is illustrated by Murakami; only specific memories are

illustrated. The specific memories are accessed directly by one of the video decoding units and not based on any configuration data as further claimed. For at least these reasons, the rejections of claim 1 under § 102 based on Tomko and Murakami are respectfully requested to be withdrawn, and allowance of claim 1 is respectfully solicited. In addition, allowance of each of claims 2-34, which depend from claim 1, is likewise solicited. Claims 2-34 also disclose additional non-obvious subject matter. For example, Tomko discloses a multichip solution, as opposed to an integrated single device as recited in claim 2.

Claims 24-32 and 34 stand rejected under 35 U.S.C. 102(e) as being anticipated by MacInnis et al. (U.S. Pat. No. 6,189,064) ("MacInnis").

Claim 24 recites an apparatus including a storage module having a memory location and an output port, the memory location to store data, a plurality of clients, each of the plurality of clients having a data access port, a router having a plurality of first-input ports coupled to the data access port of each of the plurality of clients, a second input port coupled to the output port of the storage module, a first plurality of output ports, and a second plurality of output ports, wherein the router is to route data at each one of the plurality of first input ports to a respective output port of the first or second output port based upon the data stored in the storage module, a first memory controller having a plurality of input ports coupled to the first plurality of output ports of the router, a second memory controller having a plurality of input ports coupled to the second plurality of output ports of the router, and a first arbiter having a plurality of input ports coupled to the first plurality of output ports of the router, and an output port, wherein the first arbiter selects one data access request on one of the first plurality of input ports to be provided to the output port (emphasis added).

Withdrawal of the rejection of claim 24 under § 102 is respectfully requested for at least the following reasons. MacInnis does not disclose a router having a second input port coupled to the output port of the storage module as recited. Also, MacInnis does not disclose a router that is to route data based upon the data stored in the recited storage module. For at least these reasons, allowance of claim 24 and its dependent claims is solicited. In addition, claims 25-34, which depend from claim 24 have additional non-obvious subject matter.

Claim 35 stands rejected under 35 U.S.C. 102(e) as being anticipated by Murakami et al. (U.S. Pat. No. 6,330,036) ("Murakami").

Claim 35 recites receiving a first client request from a first video decoder, routing the first client request to a first memory controller, receiving a second client request from a second video decoder, and routing the second client request to a second memory controller.


Murakami does not disclose receiving a first client request from a first video decoder as recited. Specifically, no first client request is generated by the video decoders of Murakami. A video decoder accessing its own memory as disclosed by Murakami is different than claim 1, which recites receiving a first client request from the video decoder. For example, since the video decoders of Murakami do not generate client requests, it is not possible to receive a first client request from a first video decoder as recited, or to route the request as further recited. For at least this reason, the rejection of claim 35 under § 102 based on Murakami is respectfully requested to be withdrawn, and allowance of claim 35 is respectfully solicited. In addition, allowance of each of claims 36-41, which depend from claim 35, is likewise solicited. Claims 36-41 also disclose additional non-obvious subject matter.

Applicant(s) respectfully submit that the present application is now in condition for allowance. Accordingly, the Examiner is requested to issue a Notice of Allowance for all pending claims.

Should the Examiner deem that any further action by the Applicant(s) would be desirable for placing this application in even better condition for issue, the Examiner is requested to issue a formal Notice of Allowance for all pending claims.

Respectfully submitted,

11-25-03  
\_\_\_\_\_  
Date

  
J. Gustav Larson, Reg. No. 39,263  
Attorney for Applicant(s)  
TOLER, LARSON & ABEL, L.L.P.  
P.O. Box 29567  
Austin, Texas 78755-9567  
(512) 327-5515; (512) 327-5452 (fax)